



## UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA )

v. )

JEAN LOUIS, Ghislaine )

Case No. 8:19-MJ-296 (GLF)

Defendant )

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 4, 2019, in the county of Clinton in the Northern District of New York the defendant violated:

*Code Section*

8 U.S.C. § 1325(a)(2)

*Offense Description*

Eluding examination or inspection by immigration officers.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

*Complainant's signature*

Gregg De Feo, Border Patrol Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date: May 6, 2019

*Judge's signature*

City and State: Plattsburgh, New York

Hon. Gary L. Favro, U.S. Magistrate Judge

*Printed name and title*

*United States of America v. JEAN LOUIS, Ghislaine*

On May 4, 2019, at approximately 1:50 A.M., Border Patrol Agent Kevin Dubuque encountered a gray C & L Taxi cab east of Glass road in Champlain, New York. This location is approximately a couple hundred yards from the United States - Canada international boundary. It is an area that is commonly used by subjects to illegally enter Canada and the United States. Border Patrol Agent Dubuque questioned the driver to his purpose in the area and he stated that he was looking for a fare. C & L Taxi is based out of Plattsburgh, New York approximately 30 miles south of Champlain, New York. Not many local citizens use this taxi company. Recently, Border Patrol Agents have encountered taxi cabs picking up illegal aliens near the border. The driver understood that he was possibly picking up illegal aliens and he assured BPA Dubuque that he would call the Border Patrol once he picked them up.

At approximately 2:06 A.M., Border Patrol Agent Turner was on a vehicle stop at the corner of State Route 11 and Perry Mills road, which is about 2 miles west of BPA Dubuque's encounter with the taxi cab. BPA Turner noticed a gray taxi approaching which appeared to contain several subjects, so BPA Turner shined his flashlight at the driver to pull over. BPA Turner approached the vehicle and identified himself as United States Border Patrol Agent and questioned the subjects as to their citizenships. There were seven subjects in the vehicle and they stated that they were Haitian citizens. BPA Turner then asked if they had any immigration documents to live, work or reside in the United States at which time the subjects stated "no." BPA Turner then asked the taxi driver later identified as SHEA, Dale where he picked up the subjects at which time he stated "335 Perry Mills Rd." SHEA stated that he spoke with BPA Dubuque earlier and that he was about to call the Border Patrol but then saw BPA Turner's emergency lights so he didn't call.

Border Patrol Agents placed the subjects under arrest and transported them to the Champlain Border Patrol Station for further investigation and record checks.

At the Champlain Border Patrol Station JEAN LOUIS Ghislaine's biographical information and fingerprints entered into the Department of Homeland Security databases. Records checks showed that the subject originally entered the United States of America on May 14, 2014 from Mexico at the San Ysidro, California Port of Entry. At that time she was deemed inadmissible and issued an Expedited Removal with credible fear. Subject was paroled into the United States pending a removal hearing and was later ordered deported in absentia on November 15, 2017. On January 25, 2018, JEAN LOUIS' final order of removal was placed under review. JEAN LOUIS entered Canada illegally on August 18, 2017 and claimed asylum.

Citizens of Haiti are required to apply for a visa if they seek to enter the United States. Haitian citizens who are issued a visa by the United States government are required to present the visa and the person's passport to an official at a Port of Entry as he or she seeks admission into the United States. JEAN LOUIS does not possess a valid visa and records show that she has not applied for one. If JEAN LOUIS had presented herself to a Port of Entry and asked permission to enter the United States, she would have been denied admission, as she does not possess a United States visa.